

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA                    )  
  )  
                  v.                                ) CR. NO. 2:06CR155-MHT  
  )  
QUINTRELL MARTIN                            )

UNITED STATES' UNOPPOSED MOTION  
TO CONTINUE RULE 35 HEARING

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and requests that this Honorable Court continue the hearing currently set for December 6, 2007. Good cause for the continuance is set forth below:

1. The United States has petitioned this Honorable Court to reduce Martin's sentence by 18 months. Martin was sentenced by this Honorable Court to 120 months imprisonment for his unlawful possession of firearms.

2. Martin has recently assisted the State of Alabama by testifying for the prosecution in a number of cases. These prosecutions have resulted in convictions. Currently, this Honorable Court has scheduled December 6, 2007, to consider the government's motion to reduce Martin's sentence.

3. On November 21, 2007, undersigned counsel is scheduled for hip replacement surgery outside the State of Alabama. Based upon physician advice, undersigned expects to be recovering from surgery until approximately December 14, 2007.

4. Considering Mr. Martin's significant criminal history and the nuances of his plea agreement, the United States respectfully requests that the hearing currently set for December 6, 2007, be rescheduled until after December 14, 2007. The undersigned attorney has discussed this matter with defense counsel, Mr. Richard Keith. Mr. Keith has no opposition to this motion to continue.

Respectfully submitted this the 14th day of November, 2007.

LEURA G. CANARY  
UNITED STATES ATTORNEY

s/ Verne H. Speirs  
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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Richard Keith.

LEURA G. CANARY  
UNITED STATES ATTORNEY

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